

Margaret K. Pfeiffer (MP4552)
Rita M. Carrier (RC3847)
Susan K. Nash (SN1123)
1701 Pennsylvania Ave., N.W.
Washington, D.C. 20006
Tel.: (202) 956-7500
Fax: (202) 293-6330

Attorneys for Defendants/Counterclaimants
The Battery Conservancy & Warrie Price

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
BARBARBA BROUGHEL,	:	
	:	
Plaintiff,	:	No. 07 Civ. 7755 (GBD)
v.	:	
	:	ECF Case
THE BATTERY CONSERVANCY,	:	
WARRIE PRICE, CLAIRE WEISZ, AND	:	
MARK YOES, "DBA" WEISZ + YOES,	:	
	:	
Defendants.	:	
	:	
-----X	:	

NOTICE OF MOTION FOR JUDGMENT ON THE PLEADINGS

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law in Support of Defendants' Motion for Judgment on the Pleadings, and upon all papers filed and proceedings held herein, Defendants The Battery Conservancy and Ms. Warrie Price hereby move this Court for an Order pursuant to Federal Rule of Civil Procedure 12(c), granting judgment on the pleadings and dismissing the First Amended Complaint in its entirety.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Civil Rule 6.1, Plaintiff's opposition to this motion shall be served and filed on or before March 17,

2008, and Defendant's reply shall be served and filed on or before March 24, 2008. Oral argument is requested by the Defendants.

Dated: March 3, 2008
New York, New York

Respectfully submitted,

_____/s/
Margaret K. Pfeiffer (MP4552)
Rita M. Carrier (RC3847)
Susan K. Nash (SK1123)

1701 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-5805
Tel.: (202) 956-7500
Fax: (202) 293-6330

Attorneys for Defendants/Counterclaimants
The Battery Conservancy and Warrie Price

CERTIFICATE OF SERVICE

A copy of the foregoing Notice of Motion for Judgment on the Pleadings
has been served on all counsel this 3rd day of March, 2008, via ECF.

_____/s/
Rita M. Carrier